

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

**ERIC ORTIZ, Individually and on Behalf
Of All Others Similarly Situated,
Plaintiff,**

v.

**MINSK HOSPITALITY MANAGEMENT, LLC,
AMARILLO HOSPITALITY GROUP, LLC
and JIJU THOMAS VITHAYATHIL,
Defendants.**

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§ CIVIL ACTION NO. 2:23-cv-00040

**DEFENDANTS' UNOPPOSED MOTION REGARDING
DEADLINE TO RESPOND TO PLAINTIFF'S COMPLAINT**

COMES NOW Defendants Minsk Hospitality Management, LLC, Amarillo Hospitality Group, LLC, and Jiju Thomas Vithayathil ("Defendants"), by and through their undersigned counsel of record and reserving all affirmative defenses, file this Unopposed Motion Regarding Deadline to Respond to Plaintiff's Complaint and in support thereof would show the Court as follows:

1. On March 14, 2023, Plaintiff, Eric Ortiz ("Plaintiff"), filed a Complaint in the above-referenced action.
2. Defendants were served on June 12, 2023, and must file their Answer or otherwise respond by July 3, 2023.
3. To allow sufficient time to obtain and review the necessary documentation to respond to the Complaint, Defendants respectfully requests an extension until July 17, 2023, to file a responsive pleading to the Complaint. Plaintiff's counsel has no objection to said extension.

WHEREFORE, PREMISES CONSIDERED, Defendants, Minsk Hospitality Management, LLC, Amarillo Hospitality Group, LLC, and Jiju Thomas Vithayathil, respectfully request this Honorable Court to grant this Unopposed Motion for Extension of Time and allow Defendants to file a responsive pleading to Plaintiff's Complaint by no later than July 17, 2023.

Dated: June 29, 2023.

Respectfully submitted,

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BY: /s/ Iwana Rademaekers

Iwana Rademaekers, Esq.

State Bar of Texas No. 16452560

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF CONFERENCE

I certify that the undersigned conferred with Plaintiff's counsel on June 28, 2023, concerning the relief requested in this Motion and was informed that Plaintiff does not oppose this Motion.

/s/ Iwana Rademaekers

Iwana Rademaekers, Esq.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing pleading was electronically filed with the clerk for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court, and the electronic case filing system sent a “Notice of Electronic Filing” to the following attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means, as follows:

Colby Qualls, Esq.
Email: colby@sanfordlawfirm.com
Josh Sanford, Esq.
Email: josh@sanfordlawfirm.com

June 29, 2023
Date

/s/ Iwana Rademaekers
Iwana Rademaekers